

DAVID R. JOHANSON (SBN 164141)
david.johanson@jacksonlewis.com
 MONICA R. PATEL (SBN 281786)
 Monica.patel@jacksonlewis.com
 JACKSON LEWIS LLP
 725 South Figueroa Street, Suite 2500
 Los Angeles, California 90017-5408
 Telephone: (213) 689-0404
 Facsimile: (213) 689-0430

CHARLES F. SEEMANN III (admitted *pro hac vice*)
 charles.seemann@jacksonlewis.com
 JACKSON LEWIS LLP
 650 Poydras Street, Suite 1900
 New Orleans, Louisiana 70130
 Telephone: (504) 208-1755
 Facsimile: (504) 208-1755

Attorneys for Defendants SOL HEALTHCARE, LLC;
 SOLNUS TWO, LLC; SOLNUS THREE, LLC;
 SOLNUS FOUR, LLC; SOLNUS EIGHT, LLC; SOL
 MAJER; and SHLOMO RECHNITZ

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

SERVICE EMPLOYEES INTERNATIONAL)
 UNION NATIONAL INDUSTRY PENSION)
 FUND; STEPHEN ABRECHT, Trustee, ROD)
 BASHIR, Trustee; KEVIN J. DOYLE, Trustee;)
 MYRIAM ESCAMILLA, Trustee; STEVEN W.)
 FORD, Trustee; EDWARD J. MANKO,)
 Trustee; FRANK A. MAXSON, Trustee; JOHN)
 J SHERIDAN, Trustee; LARRY T. SMITH,)
 Trustee; DAVID STILWELL, Trustee,)

Plaintiff,

vs.

EMPLOYEE EQUITY ADMINISTRATION,
 INC., a California corporation, d/b/a Westline
 Medical Management, et al.

Defendants.

Case No.: CV 12 4494 JST

**REQUEST FOR AN EXTENSION OF TIME
 TO FILE CASE MANAGEMENT
 CONFERENCE STATEMENT; and
~~PROPOSED~~ ORDER**

Date: November 6, 2013
 Time: 2:00 p.m.
 Judge: Hon. Jon S. Tigar
 Location: Courtroom 9, 19th Floor

450 Golden Gate Ave.
 San Francisco, California

**First Amended
 Complaint filed: May 16, 2013
 Trial Date: June 30, 2014**

Defendants Sol Healthcare, LLC, Solnus Two, LLC, Solnus Three, LLC, Solnus Four, LLC, Solnus Eight, LLC, Sol Majer, and Shlomo Rechnitz (collectively, the "Solnus Defendants"), hereby request a five (5) day extension of time to file their Case Management Conference Statement on or before Monday, October 28, 2013, and state as follows:

1. A Case Management Conference is currently scheduled in this case for November 6, 2013.

2. The Joint Case Management Conference Statement is due on October 23, 2013, pursuant to Docket No. 49.

3. Due to unforeseen circumstances involving court appearances and other client matters for counsel for the Solnus Defendants, the Solnus Defendants request a few extra days in order to review the proposed Joint Case Management Conference Statement circulated on October 22, 2013, by counsel for Plaintiffs Service Employees International Union National Industry Pension Fund, Stephen Abrecht, Rod Bashir, Kevin J. Doyle, Myriam Escamilla, Steven W. Ford, Edward J. Manko, Frank A. Maxson, John J. Sheridan, Larry T. Smith, and David Stillwell (collectively, the "Plaintiffs").

4. The Solnus Defendants request that the Joint Case Management Conference Statement be submitted to the Court on Monday, October 28, 2013.

5. Counsel for Plaintiffs and the Westline Defendants (which includes Defendants Employee Equity Administration, Inc., Oak Facility, Inc., RCC Facility, Inc., RV Facility, Inc., SP Facility, Inc., SJ Facility, Inc., Pleasant View Convalescent Hospital, Inc., Willow Street Properties, LLC, Northgate Center, Inc., Jaline, Inc., Skilled Logic Systems, Jack Easterday, and Deline Davis) are aware that the Solnus Defendants need additional time and, out of an abundance of caution, intend to file their Joint Case Management Conference today, October 23, 2013.

6. In light of Plaintiffs and the Westline Defendants' filing of their Joint Case Management Conference Statement today, the Solnus Defendants believe they will not be prejudiced or burdened if the court grants the Solnus Defendants an extension of time.

7. Furthermore, Plaintiffs and the Westline Defendants may ultimately join in on the Solnus Defendants' Case Management Conference Statement on or before October 28, 2013.

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1 Date: October 23, 2013

JACKSON LEWIS LLP

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3 By: /s/ David R. Johanson

4 DAVID R. JOHANSON

5 Attorneys for Defendants Sol Healthcare LLC,
6 Solnus Two, LLC; Solnus Three, LLC;
7 Solnus Four, LLC; Solnus Eight, LLC; Sol Majer; and
8 Shlomo Rechnitz

9 **~~PROPOSED~~ ORDER**

10 The terms of the Request herein above are hereby approved and adopted.

11 The Case Management Conference Statement currently due on October 23, 2013, is hereby due on
12 October 28, 2013. IT IS SO ORDERED.

13 Dated: October 24, 2013

